

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

SEALED PLAINTIFF 1 and )  
SEALED PLAINTIFF 2, )  
Plaintiffs, )  
v. ) Civil Action No. 3:22-cv-00670  
PATRIOT FRONT, *et al.*, )  
Defendants. )

**PLAINTIFFS' AGREED MOTION TO AMEND PROTECTIVE ORDER  
AND BRIEF IN SUPPORT**

## Motion

Sealed Plaintiff 1 and Sealed Plaintiff 2 (“Plaintiffs”), by counsel, move to amend the Protective Order (Dkt. 160) to make John Doe 1 a party to that Protective Order and to provide that Plaintiffs will treat John Doe 1’s identity as Highly Confidential Attorneys’ Eyes Only information under the Protective Order. The grounds for this motion are stated in the following brief in support.

## **Brief in Support**

Plaintiffs move to amend the Protective Order to make John Doe 1 a party to that Protective Order and to provide that Plaintiffs will treat John Doe 1's identity as Highly Confidential Attorneys Eyes Only information under the Protective Order. Plaintiffs state in support of this Motion:

1. Plaintiffs and John Doe 1 have entered a settlement agreement that resolves Plaintiffs' claims against John Doe 1.

2. Pursuant to the settlement agreement, Plaintiffs agreed to treat John Doe 1's identity as Highly Confidential Attorneys Eyes Only information under the Protective Order.

3. To effectuate that agreement Plaintiffs file this motion.

4. Counsel for John Doe 1 have authorized counsel for Plaintiffs to represent that John Doe 1 consents to this motion.

5. Following entry of an order amending the Protective Order, Plaintiffs will file a stipulation of dismissal with respect to John Doe 1.

6. This motion will not prejudice any party, as Plaintiffs have dismissed pursuant to a separate settlement all Defendants who are the existing counterparties to the Protective Order. *See* Dkt. 162, 163.

WHEREFORE, for the foregoing reasons and in the interest of justice, Plaintiffs ask that the Court grant this motion. A proposed Order accompanies this motion and brief.

Dated: March 21, 2025

Respectfully submitted,

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